

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON, ISSACCA
POWELL, KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN and KIMBERLY ALLEN
on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity as former
Sheriff of Shelby County, Tennessee; FLOYD BONNER,
JR., in his official capacity as Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual capacity
as former Jail Director of Shelby County, Tennessee;
KIRK FIELDS, in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE MCGHEE, in
her individual capacity as former Assistant Chief of Jail
Security of Shelby County, Tennessee; REGINALD
HUBBARD, in his official capacity as Assistant Chief of
Jail Security of Shelby County, Tennessee; DEBRA
HAMMONS, in her individual capacity as former Assistant
Chief of Jail Programs; TIFFANY WARD in her official
capacity as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY, TENNESSEE,
a Tennessee municipality; TYLER TECHNOLOGIES,
INC., a foreign corporation; GLOBAL TEL*LINK
CORPORATION, a foreign corporation; SOFTWARE
AG USA, INC., a foreign corporation; SIERRA-CEDAR,
INC., a foreign corporation; SIERRA SYSTEMS GROUP,
INC., a foreign corporation, and TETRUS CORP, a foreign
Corporation,

Defendants.

Civil Action No. 2:16-cv-02907-
SHM-tmp

Jury Demanded

**NOTICE OF SUBMISSION OF JOINT PROPOSED
THIRD AMENDED SCHEDULING ORDER**

Defendant Shelby County, Tennessee, hereby gives notice of submission to the Court of a joint proposed Third Amended Scheduling Order agreed upon by all parties to this matter, in accordance with the Court's May 29, 2020 Order Denying in Part and Granting in Part Motion Regarding Discovery (ECF No. 325).

Respectfully submitted,

/s/ Meghan M. Cox
Robert E. Craddock, Jr. (# 5826)
Odell Horton, Jr. (# 12426)
Byron N. Brown IV (# 23529)
Meghan M. Cox (# 33028)
WYATT, TARRANT & COMBS, LLP
6070 Poplar, Suite 300
Memphis, TN 38119
(901) 537-1000
rcraddock@wyattfirm.com
ohorton@wyattfirm.com
bbrown@wyattfirm.com
mcox@wyattfirm.com

AND

E. Lee Whitwell (#33622)
Shelby County Attorney's Office
160 North Main Street, Suite 950
Memphis, TN 38103
(901) 222-2100
lee.whitwell@shelbycountyttn.gov

Attorneys for Shelby County Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that on June 4, 2020, a true and correct copy of the foregoing was served upon the following counsel via the Court's ECF filing system:

Michael G. McLaren
William E. Cochran, Jr.
Brice M. Timmons
Black McLaren Jones Ryland & Griffie PC
530 Oak Court Drive, Suite 360
Memphis, TN 38117
MMcLaren@blackmclaw.com
wcochran@blackmclaw.com
btimmons@blackmclaw.com

Frank L. Watson
William F. Burns
Watson Burns, PLLC
253 Adams Avenue
Memphis, TN 38104
fwatson@watsonburns.com
bburns@watsonburns.com

Counsel for Plaintiffs

Bradley E. Trammell
Baker, Donelson, Bearman, Caldwell &
Berkowitz
165 Madison Avenue, Suite 2000
Memphis, TN 38103
btrammell@bakerdonelson.com

Beth Petronio
K&L Gates
1717 Main Street, Suite 2800
Dallas, Texas 75201
beth.petronio@klgates.com

Counsel for Tyler Technologies, Inc.

Russell Brandon Bundren
James L. Murphy
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, TN 37203
bbundren@babco.com
jmurphy@bradley.com

*Counsel for Global Tel*Link Corporation*

Kevin David Bernstein
Albert G. McLean
Spicer Rudstrom PLLC
119 S. Main Street, Suite 700
Memphis, TN 38103
kdb@spicerfirm.com
amclean@spicerfirm.com

Counsel for Sierra-Cedar, Inc.

Douglas F. Halijan
William David Irvine
Burch Porter & Johnson
130 N. Court Avenue
Memphis, TN 38103-2217
dhalijan@bpjlaw.com
wirvine@bpjlaw.com

Counsel for Software AG USA, Inc.

Heather Gwinn-Pabon
Erin McDaniel
Gordon Rees Scully Mansukhani, LLP
3401 Mallory Lane, Suite 120
Franklin, TN 37067
hgwinn@grsm.com

Counsel for Sierra Systems Group, Inc.

Robert A. McLean
Garrett M. Estep
Farris Bobango Branan, PLC
999 S. Shady Grove Road, Suite 500
Memphis, Tennessee 38120
ram@farris-law.com
gestep@farris-law.com

Counsel for Tetras Corp.

/s/ Meghan M. Cox